

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

First-Class Mail and Periodicals
Service Standard Changes, 2021

)

Docket No. N2021-1

**ASSOCIATION FOR POSTAL COMMERCE
FIRST INTERROGATORIES AND REQUESTS FOR PRODUCTION OF
DOCUMENTS TO USPS WITNESS CINTRON (POSTCOM/USPS-T-1-1-4)**

May 11, 2021

Pursuant to 39 C.F.R. § 3020.117, the Association for Postal Commerce (“PostCom”) submits these interrogatories and requests for production to United States Postal Service (“USPS” or “Postal Service”) witness Robert Cintron (USPS-T-1). If the witness cannot answer a question or subpart or provide the data requested, PostCom requests that the Postal Service answer through another witness or submit an institutional response.

Respectfully submitted,

/s/ Matthew D. Field

Matthew D. Field
Ian D. Volner
Venable LLP
600 Massachusetts Ave, N.W.
Washington, DC 20001
(202) 344-8281
mfield@venable.com
idvolner@venable.com

Counsel to Association for Postal Commerce

PostCom/USPS-T-1-1. Will the Postal Service have to add any ground transportation lanes to handle First-Class Mail volumes that are currently transported by air?

- a. If the answer is yes, please provide the following:
 - i. All known lanes that will be added to the USPS ground network.
 - ii. Total cubic volume of additional capacity for each additional lane.
 - iii. Vehicle miles per lane.
- b. If the answer is no, what will be the expected capacity utilization for the Postal Service's ground network after the service standard changes are implemented?

PostCom/USPS-T-1-2. Has the Postal Service estimated what service performance will be achieved if the proposed changes are implemented? If so, please provide the estimated results utilizing the table below:

Estimated Impact of USPS Proposed Transportation Changes					
	Proposed Transportation				
Current Transportation	1-Day	2-Day	3-Day	4-Day	5-Day
1-Day					
2-Day					
3-Day					

For example, the bottom-right cell would show the percentage of mail, currently being delivered within three days (or more) that would instead be delivered within five days (or more).

PostCom/USPS-T-1-3. Please refer to page 31 of USPS-T-1, where you state that “[t]hirty-four percent of remittance volume may be impacted by a downgrade in service.”

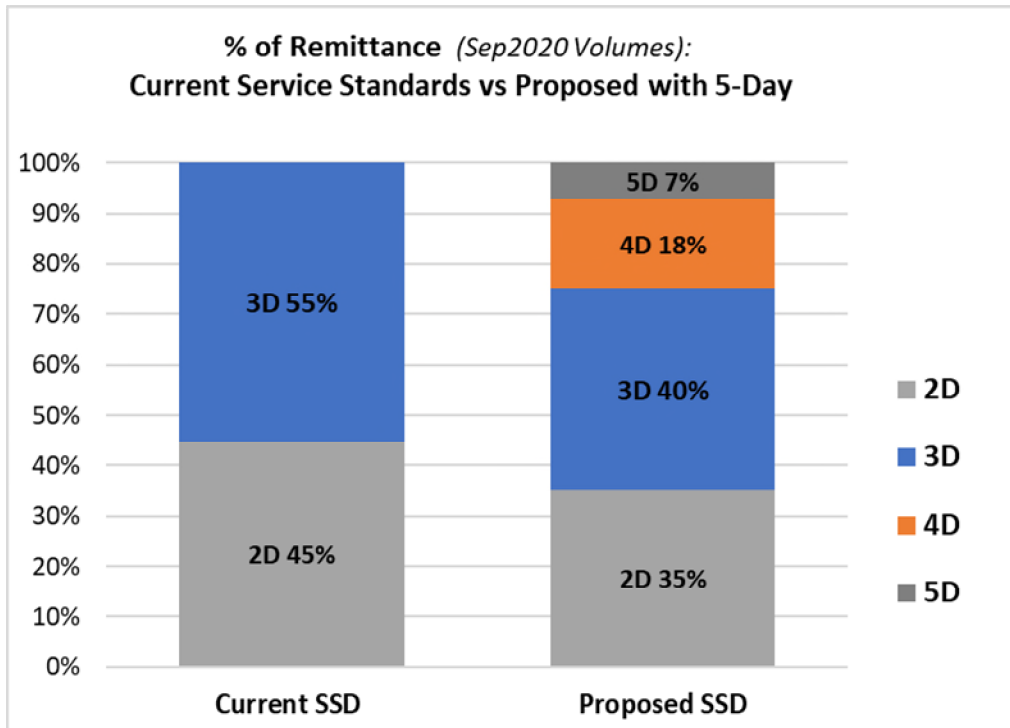
- a. Please define “remittance volume” as used in this sentence.
- b. What would be the incremental cost to the Postal Service of continuing to use air transportation for remittance volumes to prevent service downgrades?
- c. Has the Postal Service estimated the cost to remittance mailers of delayed payments? If so, please provide such estimates.

PostCom/USPS-T-1-4. Please refer to USPS-T-1 at 31, footnote 21, which states, “The Postal Service presently prioritizes remittance mail such that certain remittance mail

volume is delivered more quickly than is required under current First-Class Mail service standards.”

- a. Is the majority or minority of remittance mail prioritized and delivered more quickly than the current First-Class service standard?
- b. Please refer to the charts below, which are reproduced from Library Reference USPS-LR-N2021-1/3, Excel worksheet 3_SSD_5D_Vol_Impacts_CONUS at Tab “Remittance Impact”:

PostCom/USPS-T-1-5. Remittance Volume					
Current Service Standard	Proposed Service Standard	Remittance in First Class Daily Volume	Current service standard % of Total Volume	Proposed service standard % of Total Volume	% of Current SSD Volume
2D	2D	3,820,282	45%	35%	79%
2D	3D	1,037,579		10%	21%
2D	4D	36		0%	0%
3D	2D	0	55%	0%	0%
3D	3D	3,285,481		30%	55%
3D	4D	1,928,187		18%	32%
3D	5D	775,704		7%	13%
Remittance Volume		10,847,269	% Downgrade of Remittance	34%	



- i. Confirm that for the remittance volume that is prioritized, the downgrade from actual service (as opposed to the standard) will be even more severe than depicted in these charts?
- ii. How does the remittance volume that will be downgraded breakout across the change from 2 days to 3 days, to 4 days, to 5 days; and from 3 days to 4 days and to 5 days?